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REASSURE AMERICA LIFE
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

REASSURE AMERICA LIFE INSURANCE COMPANY) Case No.: CV 11-00488 MMC
13)
14 Plaintiff.) **STIPULATED JUDGMENT IN**
15 v.) **INTERPLEADER**
16 ANDRIA D. R. BATISE, VERNA I. CHASE, ,)
17 MICKAELE CHASE, ALEXANDER CHASE)
and DOES 1-10, inclusive,)
18 Defendants.

Upon reading the Stipulation and Order for Entry of Judgment in Interpleader Discharging plaintiff Reassure America Life Insurance Company (“Reassure”), and it appearing that Plaintiff Reassure has properly brought this action in interpleader, that this Court has jurisdiction of the parties and of the subject herein, and that good cause appearing therefore,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

26 1. That, by reason of the death of Michael Chase ("decedent"), on July 25, 2010, the
27 sum of One Hundred and Fifty Thousand Dollars (\$150,000.00)

1 ("Benefit proceeds") became payable pursuant to Life Insurance Policy No. AUSE0019010 (the
 2 "Policy") that was issued by Valley Forge Life Insurance Company to the decedent effective July
 3 24, 2000; (Reassure assumed Valley Forge Life Insurance Company's business including the
 4 insured's policy and currently administers the insured's policy)

5 3. That defendants Andria D.R. Batise, Verna Iathe Chase, Mickaele Chase and
 6 Alexander Chase each claim entitlement to some or all of the Benefit Proceeds and that, to date, no
 7 other person or entity currently makes claim to Reassure for the Benefit Proceeds;

8 4. That Reassure was ready, willing, and able to deliver the Benefit Proceeds to the
 9 person(s) legally entitled thereto. However, by reason of the actual and potential competing claims
 10 to the Benefit Proceeds, Reassure did not know and was unable to determine the person(s) legally
 11 entitled to them;

12 5. That concurrently with the filing of its complaint in interpleader, Reassure deposited
 13 with the Clerk of this Court the Benefit Proceeds, totaling One Hundred Fifty Two Thousand, Three
 14 Hundred and Seventy Dollars and Fifty-FourCents (\$152,370.54), which represents the insurance
 15 proceeds payable under the Policy, plus interest;

16 6. That having deposited the monies with the Clerk of the Court on or about March 9,
 17 2006, Reassure, its predecessors, successors, affiliates, parent corporation, officers and agents are
 18 fully and forever released, discharged, and acquitted from any liability of any kind or nature
 19 whatsoever under the Policy or by reason of the death of the decedent as to any and all claims,
 20 charges, demands, or otherwise that exist now or may arise at any time in the future;

21 7. That Reassure is entitled to fees of \$ 13,754.00 and costs of 544.25, for a total of
 22 \$14,298.25, to be paid out of the Benefit Proceeds deposited with the Clerk of this Court and
 23 payable to "Reassure America Life Insurance Company," C/O Renae Hermann, Esq. Reassure
 24 America Life Insurance Company, P.O. Box 600, Southfield, Michigan 48037-0600.

25 8. The defendants hereby stipulate that the remaining Benefit Proceeds deposited with
 26 the Clerk of the Court will be divided among the parties and paid out as follows:

27 a. Andria D.R. Batise will receive \$10,000.00 payable by check or draft to Andria D.R.
 28 Batise; C/O Haydel & Ornellas, 3350 Deer Park Drive, Stuie A, Stockton, CA 95219.

1 b. Verna Ianthe Chase will receive \$42,648.07, plus 33 1/3% of any interest accrued on
2 the Benefit Proceeds deposited with the Court, payable by check or draft to Verna Ianthe Chase,
3 P.O. Box 4744, Stockton, CA, 95204.

4
5 c. Mikaele Chase will receive \$42,648.07, plus 33 1/3% of any interest accrued on the
6 Benefit Proceeds deposited with the Court, payable by check or draft to Douglas A. Haydel,
7 trustee for Mickaele Chase, Haydel & Ornella, 3350 Deer Park Drive, Suite A, Stockton CA,
8 95219;

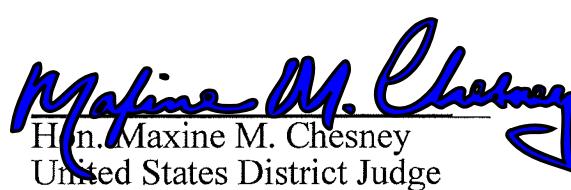
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10 d. Alexander Chase will receive \$42,648.07, plus 33 1/3% of any interest accrued on
11 the Benefit Proceeds deposited with the Court, payable by check or draft to Douglas A. Haydel,
12 trustee for Alexander Chase, Haydel & Ornella, 3350 Deer Park Drive, Suite A, Stockton CA,
13 95219;

14
15 9. That payments are made by the Clerk of the District Court in accordance with
16 paragraphs 8 (a) through (d) above.

17
18 10. That defendants Andria D.R. Batise, Verna I. Chase, Mickaele Chase and Alexander
19 Chase are permanently enjoined from instituting or prosecuting any proceeding in any state or
20 United States court against Reassure, its predecessors, successors, affiliates, parent corporation,
officers and agents with respect to the proceed due under the Policy; and

21
22 11. That Reassure is dismissed from this action with prejudice and the entire action is
23 dismissed.

24
25 Dated: May 13, 2011


Hon. Maxine M. Chesney
United States District Judge